

BEFORE THE PUBLIC UTILITIES  
COMMISSION OF THE STATE OF CALIFORNIA



**FILED**

03-19-07  
12:57 PM

Order Instituting Investigation to Consider Policies To Achieve the Commission's Conservation Objectives For Class A Water Utilities.

Investigation 07-01-022  
(Filed January 11, 2007)

In the Matter of the Application of Golden State Water Company (U 133 E) for Authority to Implement Changes in Ratesetting Mechanisms and Reallocation of Rates.

Application 06-09-006  
(Filed September 6, 2006)

Application of California Water Service Company (U 60 W), a California Corporation, requesting an Order from the California Public Utilities Commission Authorizing Applicant to Establish a Water Revenue Balancing Account, a Conservation Memorandum Account, and Implement Increasing Block Rates.

Application 06-10-026  
(Filed October 23, 2006)

Application of Park Water Company (U 314 W) for Authority to Implement a Water Revenue Adjustment Mechanism, Increasing Block Rate Design and a Conservation Memorandum Account.

Application 06-11-009  
(Filed November 20, 2006)

Application of Suburban Water Systems (U 339 W) for Authorization to Implement a Low Income Assistance Program, an Increasing Block Rate Design, and a Water Revenue Adjustment Mechanism.

Application 06-11-010  
(Filed November 22, 2006)

**DISABILITY RIGHTS ADVOCATES'  
NOTICE OF INTENT TO CLAIM COMPENSATION**

Disability Rights Advocates  
Melissa W. Kasnitz  
Lisa Burger  
2001 Center Street, 3<sup>rd</sup> Floor  
Berkeley, CA 94704  
Telephone: 510-665-8644  
Fax: 510-665-8511  
TTY: 510-665-8716  
[pucservice@dralegal.org](mailto:pucservice@dralegal.org)

March 19, 2007

## I. INTRODUCTION

Pursuant to Section 1804(a) of the Public Utilities Code<sup>1</sup> and Assigned Commissioner Bohn's Ruling and Scoping Memo issued March 8, 2007, Disability Rights Advocates ("DisabRA") hereby gives timely notice of its intent to claim compensation in this proceeding. DisabRA is a non-profit legal center dedicated to the advancement of civil rights for people with disabilities in the United States and throughout the world. The information provided below shall demonstrate that DisabRA meets the requirements to be found eligible for compensation.

DisabRA is an organization that has previously represented the interests of customers with disabilities before this Commission and it has been found to be eligible for Intervenor Compensation.<sup>2</sup> DisabRA's articles of incorporation specifically authorize our representation of the interests of disabled customers. More specifically, these articles state that we are a 501(c)(3) organization established to engage in public interest litigation and advocacy to protect the rights of people with disabilities. Therefore, pursuant to Section 1802(b), DisabRA is a "customer" as that term is used in the intervenor compensation statutes.<sup>3</sup>

Rule 1802(b) requires intervenors to identify their economic interest in the proceeding as a prerequisite for eligibility for intervenor compensation; this rule was recently discussed at some length in D.06-12-041. This decision made clear that the Commission has historically granted customer status to organizations, such as DisabRA, "that represent ratepayer interests that are not solely economic, recognizing that

---

<sup>1</sup> All citations are to the California Public Utilities Code unless otherwise indicated.

<sup>2</sup> Recent proceedings in which DisabRA was found eligible for compensation include A.05-12-002 (*see* Ruling issued March 7, 2006) and A.06-06-032 (*see* Ruling issued November 9, 2006).

<sup>3</sup> In D.98-04-059, the Commission directed intervenors to state in their NOIs which of three customer "categories" they fall within. DisabRA fits the third category as a "group or organization that is authorized by its bylaws or articles of incorporation to represent the interest of residential ratepayers." DisabRA's articles of incorporation were last attached to NOIs submitted in conjunction with proceedings R.03-04-003 and R.04-12-001. These articles remain unchanged. Additional copies of the articles can be provided upon request.

participation in Commission proceedings by parties representing the full range of affected interests is important,”<sup>4</sup> and explicitly noting that existing substantive standards regarding customer status are not being changed.<sup>5</sup>

While it is difficult to attach a dollar value to the issues DisabRA intends to address in this proceeding, we expect to represent the interests of consumers with disabilities, who are disproportionately low income, in obtaining essential amounts of water at an affordable price. DisabRA also will promote effective low-income water affordability programs and consumer protections regarding billing, metering, rationing and other issues that directly affect consumers with disabilities in this proceeding.

Pursuant to D.98-04-059, Finding of Fact 13, an intervenor must show that it will represent customer interests that would otherwise be underrepresented. Based on the collaboration that has already taken place between consumer groups, DisabRA expects to be the only intervenor focusing on the interests of people with disabilities, a group that will be greatly affected by the Commission’s action to address water conservation rates, including the creation of low income programs to enhance conservation efforts.

While some of the issues facing people with disabilities are common to all residential and low income customers who will be represented by additional consumer groups in this proceeding, DisabRA has already and will continue to coordinate its efforts with those intervenors to avoid undue duplication.<sup>6</sup> DisabRA also expects to raise concerns throughout this proceeding that are unique to people with disabilities and will not be addressed by other intervenors, as described below.

---

<sup>4</sup> D.06-12-041 at 6-7.

<sup>5</sup> *Id.* at 7.

<sup>6</sup> *See, e.g.*, Joint Consumer Response to Scoping Memo, filed January 27, 2007.

A. **Section 1804(a)(2)(A)(i) – A statement of the nature and extent of Disability Rights Advocates’ planned participation in the proceeding as far as it is possible to set it out when notice of intent is filed.**

Section 1804(a)(2)(A)(i) requires the customer to set forth a statement of the nature and extent of the customer’s planned participation in the proceeding as far as it is possible to set it out when the notice of intent is filed. To date, DisabRA has filed a response to the OII in conjunction with other consumer groups, attended the Commission’s pre-conference hearing held on February 7, 2007, and worked with other consumer groups and DRA to coordinate and address procedural issues.

Ongoing, we expect to participate in both phases of the proceeding, including Phase I regarding potential settlements and additional rate-related conservation measures (including likely hearings) and Phase II addressing non-rate design conservation measures. With regard to Phase I, DisabRA may seek limited information as settlement discussions take place, but primarily expects to participate with comments and replies on any settlements and to participate in hearings on conservation rate issues not covered by settlements. DisabRA also expects to provide comments on any proposed decision put before the Commission on Phase I. Phase II, which will likely cover many of the issues of greatest concern to DisabRA, will be quasi-legislative, though hearings may still be held. No scoping memo has yet been issued for Phase II. DisabRA anticipates there will be at least two sets of comments on Phase II (initial comments and comments on a proposed decision), but we cannot make clear estimates at this time. The estimates set forth in this NOI represent DisabRA’s best current estimates of time for this proceeding.

Throughout both phases of this proceeding, we expect to focus on low-income issues and conservation measures, both generally and with regard to their impact on people with disabilities, and we will spend less time on rate design issues, as detailed in the table below. We will also expend time on general procedural matters.

**B. Section 1804(a)(2)(A)(ii) – Disability Rights Advocates’ itemized estimate of the compensation that the consumer expects to request given the duration of the proceeding as it appears at the time.**

DisabRA will seek compensation at 2007 rates for work performed in connection with this proceeding.<sup>7</sup> DisabRA currently estimates that it will devote roughly 100 hours of DisabRA attorney Lisa Burger’s time (at a proposed hourly rate of \$200), and 80 hours of DisabRA Managing Attorney Melissa W. Kasnitz’s time (at a proposed hourly rate of \$390.00). DisabRA also currently estimates that it will devote roughly 25 hours of a law clerk’s time (at a proposed hourly rate of \$100).

DisabRA anticipates retaining an expert for this proceeding to review the accessibility of the Applicants’ websites for people with disabilities. DisabRA estimates that its expert will need to spend approximately 10-12 hours (at an estimated hourly rate of \$125).<sup>8</sup> Finally, DisabRA expects to incur reasonable costs of approximately \$2000 during this proceeding. Such costs will include photocopying and printing, postage and delivery, telephone and fax, and other basic expenses. Together, these hours, rates and costs produce a total projected budget of \$57,200.

	<b>Total</b>
Melissa Kasnitz	\$31,200
Lisa Burger	\$20,000
Law Clerk	\$2,500
Expert	\$1,500
Costs	\$2,000
<b>Total Projected Budget:</b>	<b>\$57,200</b>

---

<sup>7</sup> The proposed 2007 rates herein are based on rates approved previously by the Commission for DisabRA, adjusted pursuant to the measures adopted by the Commission in D.07-01-009.

<sup>8</sup> DisabRA’s expert rates are in the lowest range of expert costs set forth in D.07-01-009, but this estimate reflects what we expect to be charged.

DisabRA estimates that its personnel will devote the following proportions of their time to the various issues in this proceeding:

<b>Issue</b>	<b>Percentage of Time</b>
General / Procedural / Case Management <ul style="list-style-type: none"><li>• Reviewing Commission rulings</li><li>• Reviewing parties' filings</li><li>• Coordinating with Joint Consumers</li><li>• General case management</li></ul>	20%
Rate Design / WRAM <ul style="list-style-type: none"><li>• Settlement issues</li><li>• Billing frequency</li><li>• Multi-family dwellings</li><li>• Special concerns regarding people with disabilities</li></ul>	10%
Low Income Issues & Outreach <ul style="list-style-type: none"><li>• Settlement issues</li><li>• Bill payment assistance</li><li>• Low income outreach, including targeted outreach to people with disabilities</li></ul>	35%
Conservation Measures & Outreach <ul style="list-style-type: none"><li>• Outreach on conservation measures, including targeted outreach to people with disabilities</li><li>• Incentives for conservation</li><li>• Rationing</li><li>• Low income efficiency and conservation</li></ul>	35%

Notwithstanding the estimates provided above, at the time of this filing there remains substantial ambiguity regarding the scope and schedule of this proceeding. DisabRA's above estimates are based on what has already occurred in this proceeding, the OII, the subsequent discussions at the pre-hearing conference on February 7, 2007, and the Assigned Commissioner's Ruling and Scoping Memo issued on March 8, 2007. Depending on the scope of Phase II and any potential changes in Phase I, DisabRA's

expected time commitment and budget would change accordingly. The reasonableness of hourly rates requested for DisabRA's attorneys will be addressed in our Request for Compensation.

C. **Section 1804(a)(2)(B) – Disability Rights Advocates' participation in the proceeding poses a significant financial hardship.**

Participation in this proceeding constitutes a significant financial hardship for DisabRA. The definition of the term "significant financial hardship" is found in Section 1802(g):

"Significant financial hardship" means either that the customer cannot without undue hardship afford to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation, or that, in the case of a group or organization, the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding.

DisabRA represents the disabled customer class. The Commission has recognized that adequate representation requires not only the broad efforts of the CPUC Division of Ratepayer Advocates, which represents all customer classes, but also the participation of parties with special interests. DisabRA represents the overall interests of more than 6,000,000 disabled Californians, a population that has much at stake with the Commission's evaluation of water conservation rates and contemplated creation of a low-income water affordability program. However, the economic interest of individual members of this group is small when compared to the costs of effective participation in Commission proceedings.

As a non-profit organization, DisabRA does not accept fees from its clients and receives no government funding. DisabRA relies primarily upon awards of attorneys' fees in litigation where DisabRA represents the prevailing party, as well as donations from private individuals, private foundations, and corporate contributions as its sources of income. DisabRA also receives grants for certain

special projects that advance the needs of disabled persons. However, no funds from any of these sources have been obtained to directly support DisabRA's participation in this proceeding.<sup>9</sup> Therefore, our participation in this proceeding represents a significant financial burden. Absent eligibility for intervenor compensation, DisabRA would not have adequate resources to advocate for people with disabilities before the Commission. As a result of this hardship, DisabRA intends to seek compensation for participation in this proceeding.<sup>10</sup>

## **II. CONCLUSION**

The information provided above satisfies the requirements of Section 1804(a) and supports a finding of "significant financial hardship." In addition, DisabRA has demonstrated that it will represent a group with interests that would otherwise be underrepresented in the Commission's evaluation of water conservation rates, a low-income affordability program, and other issues. DisabRA respectfully asks the Commission for a prompt determination of its eligibility for compensation in these proceedings.

---

<sup>9</sup> In 2005, DisabRA received a grant from the Community Technology Foundation of California (CTFC) for general support of its work before the Commission in the area of telecommunications. However, this general grant does not provide support for participation in any specific proceeding, nor would application of these funds be appropriate for a water proceeding.

<sup>10</sup> More detailed information about DisabRA's financial position can be provided when DisabRA submits its actual request for compensation. However, it should be noted that the test for significant financial hardship looks to the economic interest of individual members of the group being represented in comparison to the costs of effective participation, not the resources of the organization representing the interest group. Of course, it would not be cost-effective for individual people with disabilities to appear before the Commission to participate in the efforts to establish water conservation rates and create a low-income affordability program.



Signed March 19, 2007

Respectfully Submitted,

/s/

MELISSA W. KASNITZ  
Disability Rights Advocates  
2001 Center Street, Third Floor  
Berkeley, CA 94704

## VERIFICATION

I, Melissa Kasnitz, am a representative of Disability Rights Advocates and am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true to the best of my knowledge, except for those matters that are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the day of Friday, March 19, 2007, at Berkeley, California.

\_\_\_\_\_/s/

Melissa W. Kasnitz  
Disability Rights Advocates  
2001 Center Street, Third Floor  
Berkeley, CA 94704

**CERTIFICATE OF SERVICE**

I certify that I have by electronic mail served a true copy of Disability Rights  
Advocates' Notice of Intent to Claim Compensation on all known parties to I.07-01-022.

Dated March 19, 2007, at Berkeley, California.

/s/  
Ashvin Kamath

**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**Service Lists**

**Proceeding: I0701022 - CLASS A WATER CONSER**

**Filer: CPUC - CLASS A WATER COMPANIES**

**List Name: LIST**

**Last changed: March 8, 2007**

---

**Appearance**

CHARLIE HARAK  
NATIONAL CONSUMER LAW CENTER  
77 SUMMER STREET, 10TH FLOOR  
BOSTON, MA 02110-1006

JEAN L. KIDDOO  
ATTORNEY AT LAW  
BINGHAM MCCUTCHEN LLP  
3000 K STREET, N.W. SUITE 300  
WASHINGTON, DC 20007

OLIVIA B. WEIN  
ATTORNEY AT LAW  
NATIONAL CONSUMER LAW CENTER  
1001 CONNECTICUT AVE., NW., STE. 510  
WASHINGTON, DC 20036

FRED G. YANNEY  
ATTORNEY AT LAW  
FULBRIGHT & JAWORSKI, LLP  
555 SOUTH FLOWER STREET  
LOS ANGELES, CA 90071

EDWARD N. JACKSON  
DIRECTOR REVENUE REQUIREMENTS  
PARK WATER COMPANY  
COMPANY  
9750 WASHBURN ROAD  
RD.  
DOWNEY, CA 90241-7002

LEIGH K. JORDAN  
SENIOR VP  
APPLE VALLEY RANCHOS WATER  
PO BOX 7002, 9750 WASHBURN  
DOWNEY, CA 90241-7002

ROBERT J. DIPRIMIO  
VALENCIA WATER COMPANY  
24631 AVENUE ROCKEFELLER  
VALENCIA, CA 91355

ROBERT KELLY  
SUBURBAN WATER SYSTEMS  
1211 EAST CENTER COURT DRIVE  
COVINA, CA 91724-3603

DANIEL A. DELL'OSA  
SAN GABRIEL VALLEY WATER COMPANY  
11142 GARVEY AVENUE, PO BOX 6010  
EL MONTE, CA 91733

MICHAEL L. WHITEHEAD  
SAN GABRIEL VALLEY WATER CO.  
PO BOX 6010  
EL MONTE, CA 91734

TIMOTHY J. RYAN  
ATTORNEY AT LAW  
SAN GABRIEL VALLEY WATER COMPANY

KEITH SWITZER  
GOLDEN STATE WATER COMPANY  
630 EAST FOOTHILL BLVD.

11142 GARVEY AVENUE, PO BOX 6010  
EL MONTE, CA 91734

SAN DIMAS, CA 91773

RONALD MOORE  
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC  
630 EAST FOOTHILL BLVD.  
SAN DIMAS, CA 91773

KENDALL H. MACVEY  
ATTORNEY AT LAW  
BEST, BEST & KRIEGER, LLP  
PO BOX 1028  
RIVERSIDE, CA 92502

CHRISTINE MAILLOUX  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, NO. 350  
SAN FRANCISCO, CA 94102

JACK HAWKS  
CALIFORNIA WATER ASSOCIATION  
601 VAN NESS AVE., SUITE 2047  
SAN FRANCISCO, CA 94102

NINA SUETAKE  
ATTORNEY AT LAW  
COMMISSION  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVE., STE 350  
SAN FRANCISCO, CA 94102

MARCELO POIRIER  
CALIF PUBLIC UTILITIES  
LEGAL DIVISION  
ROOM 5025  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MARIA L. BONDONNO  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
LEGAL DIVISION  
ROOM 4008  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MONICA L. MCCRARY  
CALIF PUBLIC UTILITIES  
LEGAL DIVISION  
ROOM 5134  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

NATALIE WALES  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ENRIQUE GALLARDO  
LATINO ISSUES FORUM  
160 PINE STREET, SUITE 700  
SAN FRANCISCO, CA 94111

JOSE E. GUZMAN, JR.  
ATTORNEY AT LAW  
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
50 CALIFORNIA STREET, 34TH FLOOR  
FLOOR  
SAN FRANCISCO, CA 94111

LENARD G. WEISS  
ATTORNEY AT LAW  
STEEFEL, LEVITT & WEISS, P.C.  
ONE EMBARCADERO CENTER, 30TH  
FLOOR  
SAN FRANCISCO, CA 94111

LORI ANNA DOLQUEIST

MARTIN A. MATTES

ATTORNEY AT LAW  
STEEFEL, LEVITT & WEISS  
ELLIOTT, LLP  
ONE EMBARCADERO CENTER, 30TH FLOOR  
FLOOR  
SAN FRANCISCO, CA 94111

ATTORNEY AT LAW  
NOSSAMAN, GUTHNER, KNOX &  
50 CALIFORNIA STREET, 34TH  
SAN FRANCISCO, CA 94111

DAVID M. MARQUEZ  
STEEFEL, LEVITT & WEISS  
ONE EMBARCADERO CENTER, 30TH FLOOR  
CALIFORNIA  
SAN FRANCISCO, CA 94111-3719  
340

ALEXIS K. WODTKE  
STAFF ATTORNEY  
CONSUMER FEDERATION OF  
520 S. EL CAMINO REAL, STE.  
SAN MATEO, CA 94402

MELISSA W. KASNITZ  
ATTORNEY AT LAW  
DISABILITY RIGHTS ADVOCATES  
COMPANY  
2001 CENTER STREET, THIRD FLOOR  
BERKELEY, CA 94704-1204

DAVID P. STEPHENSON  
DIRECTOR OF RATES & PLANNING  
CALIFORNIA-AMERICAN WATER  
4701 BELOIT DRIVE  
SACRAMENTO, CA 94838

FRANCIS S. FERRARO  
CALIFORNIA WATER SERVICE COMPANY  
1720 NORTH FIRST STREET  
COMPANY  
SAN JOSE, CA 95112

LYNNE P. MCGHEE  
ATTORNEY AT LAW  
CALIFORNIA WATER SERVICE  
1720 NORTH FIRST STREET  
SAN JOSE, CA 95112

BETTY R. ROEDER  
PRESIDENT  
GREAT OAKS WATER COMPANY  
15 GREAT OAKS BLVD., SUITE 100  
SAN JOSE, CA 95119

PALLE JENSEN  
SAN JOSE WATER COMPANY  
374 WEST SANTA CLARA ST.  
SAN JOSE, CA 95196

BILL MARCUS  
JBS ENERGY  
311 D STREET, STE. A  
WEST SACRAMENTO, CA 95605

JEFFREY NAHIGIAN  
JBS ENERGY, INC.  
311 D. STREET  
WEST SACRAMENTO, CA 95605

DARLENE M. CLARK  
CALIFORNIA AMERICAN WATER  
4701 BELOIT DRIVE  
SACRAMENTO, CA 95838-2434

**A. Information Only**

DANIELLE C. BURT  
BINGHAM MCCUTCHEN LLP  
LLC  
3000 K STREET, NW, SUITE 300  
WASHINGTON, DC 20007-5116

JOHN GREIVE  
LIGHTYEAR NETWORK SOLUTIONS,  
1901 EASTPOINT PARKWAY  
LOUISVILLE, KY 40223

MARY CEGELSKI  
FIRST COMMUNICATIONS, LLC  
15166 NEO PARKWAY  
160  
GARFIELD HEIGHTS, OH 44128

CHARLES FORST  
360NETWORKS(USA) INC.  
867 COAL CREEK CIRCLE/SUITE  
LOUISVILLE, CO 80027

DAVID A. EBERSHOFF  
ATTORNEY AT LAW  
FULBRIGHT & JAWORSKI, L.L.P.  
555 SO. FLOWER STREET, 41ST FLOOR  
LOS ANGELES, CA 90017

DOUGLAS K. MARTINET  
PARK WATER COMPANY  
PO BOX 7002  
DOWNEY, CA 90241

DONALD R. WARD  
ORCUTT AREA ADVISORY GROUP, INC.  
COMMISSION  
4689 MARLENE DRIVE  
LAW JUDGES  
SANTA MARIA, CA 93455

REGINA DEANGELIS  
CALIF PUBLIC UTILITIES  
DIVISION OF ADMINISTRATIVE  
ROOM 2251  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DEBBIE DAVIS  
LEGISLATIVE ANALYST  
106-292  
ENVIRONMENTAL JUSTICE COALITION FORWATER  
654 13TH STREET  
PRESERVATION PARK, CA 94612

DAVID MORSE  
1411 W, COVELL BLVD., SUITE  
DAVIS, CA 95616-5934

MATT VANDER SLUIS  
PLANNING AND CONSERVATION LEAGUE  
1107 9TH STREET, SUITE 360  
SACRAMENTO, CA 95814

**B. State Service**

BERTRAM D. PATRICK  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5110  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

EDWARD HOWARD  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
DIVISION OF STRATEGIC PLANNING  
ROOM 5110  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JAEEYON PARK  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
WATER BRANCH  
LAW JUDGES  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOYCE STEINGASS  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
WATER BRANCH  
COMPLIANCE BRAN  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LAURA L. KRANNAWITTER  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
EXECUTIVE DIVISION  
ROOM 5303  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SEAN WILSON  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN  
AREA 3-C  
505 VAN NESS AVENUE

DIANA BROOKS  
CALIF PUBLIC UTILITIES  
WATER BRANCH  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

FRED L. CURRY  
CALIF PUBLIC UTILITIES  
WATER ADVISORY BRANCH  
ROOM 3106  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JANICE L. GRAU  
CALIF PUBLIC UTILITIES  
DIVISION OF ADMINISTRATIVE  
ROOM 5011  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KENNETH BRUNO  
CALIF PUBLIC UTILITIES  
UTILITY AUDIT, FINANCE &  
ROOM 3-C  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PATRICK HOGLUND  
CALIF PUBLIC UTILITIES  
WATER BRANCH  
ROOM 3200  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TATIANA OLEA  
CALIF PUBLIC UTILITIES  
WATER BRANCH  
ROOM 4104  
505 VAN NESS AVENUE



SAN FRANCISCO, CA 94102-3214

SAN FRANCISCO, CA 94102-3214